

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

THE UNITED STATES OF AMERICA,

Plaintiff,

-vs-

D-1 ELENIBUCCA,

Defendant.

Case: 2:20-cr-20359

Assigned To : Drain, Gershwin A.

Referral Judge: Whalen, R. Steven

Assign. Date : 8/19/2020

Description: INFO USA v. BUCCA
(SO)

I N F O R M A T I O N

THE UNITED STATES ATTORNEY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Information:

1. LA Insurance, Inc. was a company that sold various insurance products.
2. LA Insurance maintained an account at a Citizens Bank branch in Royal Oak, Michigan. Citizens Bank was a financial institution, as defined by 18 U.S.C. §20.

3. Defendant ELENIBUCCA was employed as an assistant to the president of LA Insurance, working at the company headquarters in Royal Oak, Michigan. Among other things, Defendant ELENIBUCCA made bookkeeping entries for the company using a QuickBooks program.

5. In her position, defendant ELENIBUCCA had access to the routing and account number information for the LA Insurance account at Citizens Bank.

6. During the approximate time-period from April 2019 through August 2019, defendant ELENIBUCCA initiated approximately 11 wire transfers of funds from the LA Insurance account at Citizens Bank to accounts of defendant ELENIBUCCA and other persons. Each transfer was executed without authorization and was for a purpose unrelated the business of LA Insurance. Each wire transfer was initiated in the Eastern District of Michigan and was routed through a Citizen Bank server located outside of the State of Michigan.

7. Defendant ELENIBUCCA also used funds in the LA Insurance account at Citizens Bank to purchase a cashier's check. Defendant

ELENI BUCCA used the cashier's check to purchase a Rolex watch at a jewelry store.

8. Defendant ELENI BUCCA concealed the theft of corporate funds by making false entries in the LA Insurance QuickBooks program.

COUNT 1
Wire Fraud - 18 U.S.C. §1343
D-1 ELENI BUCCA

9. The General Allegations are included in this count.

10. Beginning in April 2019 and continuing through August 2019, in the Eastern District of Michigan, defendant ELENI BUCCA, knowingly and with intent to defraud, devised and executed a scheme to defraud her employer, LA Insurance, to obtain money and funds by means of material false and fraudulent promises, representations and omissions, and in doing so, transmitted and caused to be transmitted in interstate commerce, certain writings, signs, signals, pictures and sounds for the purpose of executing the scheme to defraud; that is, defendant ELENI BUCCA embezzled funds from her employer. LA Insurance, by executing and causing to be executed approximately eleven (11) wire transfers of funds in interstate commerce from the LA Insurance

account at Citizens Bank to accounts of defendant ELEN BUCCA and others. Each wire transfer was conducted without authorization and for purposes unrelated to the business of LA Insurance.

In violation of Title 18, United States Code, Section 1343.

Respectfully submitted,

MATTHEW SCHNEIDER
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/s/ John K. Neal

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